

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
JUSTIN J. VERNOT	:	VIOLATIONS: 18 U.S.C. § 875(c) (Threats - 5 counts)

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times relevant to this Indictment, K.B. was an adult female (whose identity is known to the Grand Jury), residing within the Eastern District of Pennsylvania.
2. Twitter, Inc., is an Internet service, located in San Francisco, CA, which permits its subscribers to broadcast short messages ("tweets") and to receive responses from those who follow their tweets.
3. Between on or about February 7, 2012, and on or about February 10, 2012, defendant JUSTIN J. VERNOT sent threats to K.B. by means of her Twitter account, in which he threatened to rape her, to murder her, and to murder her son.
4. On or about February 7, 2012 at 1:06:34 AMEST, defendant JUSTIN J. VERNOT created a Twitter account, @ColdDeadEyes.
5. On or about February 7, 2012 at 1:14:21 AMEST, defendant JUSTIN J. VERNOT sent a tweet to K.B. which read, "I know your routine, I know where you live, and I am going to rape you senseless K. ... then come for [K.B.'s son's name]. Good luck."

6. On or about February 7, 2012 at 1:22:32 AM EST, defendant JUSTIN J. VERNOT sent a tweet to K.B. which read, "I am coming for your son Kate, but I'll slit his throat quickly to minimize any suffering. R.I.P. L.B. ... ;)"

7. On or about February 7, 2012 at 3:02:47 PM EST, defendant JUSTIN J. VERNOT sent a tweet to K.B. which read, "Maybe I will force your son to watch his mom being raped and then choked to death, and then kill him afterwards. Hmm ..."

8. On or about February 10, 2012 at 2:02:50 AM, defendant JUSTIN J. VERNOT created a Twitter account @BlackMam1.

9. On or about February 10, 2012 at 2:05:53 AM, defendant JUSTIN J. VERNOT, sent a tweet to K.B. which read, "I'm coming for you and [K.B.'s son's name] my love. His head and your c\*\*t will be mine very shortly. Keep looking over your shoulder. Good luck."

10. On or about February 10, 2012 at 2:08:50 AM, defendant JUSTIN J. VERNOT, sent a tweet to K.B. which read, "Tick tock, tick tock K. I'm always aware of where you are, my love. It won't be long now ... ;)"

### **THE CHARGES**

11. On or about each of the dates listed below, each date and time constituting a separate Count of this Indictment, defendant

**JUSTIN J. VERNOT**

transmitted in interstate commerce communications containing threats to injure K.B. and her son. (The facts of each such threatening communication are set forth above in the referenced paragraphs.)

COUNT	DATE	TIME	PARAGRAPH
ONE	February 7, 2012	1:14:21 AM EST	5
TWO	February 7, 2012	1:22:32 AM EST	6
THREE	February 7, 2012	3:02:47 PM EST	7
FIVE	February 10, 2012	2:05:53 AM EST	9
FOUR	February 10, 2012	2:08:50 AM EST	10

All in violation of Title 18, United States Code, Section 875(c)

A TRUE BILL:

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FOREPERSON



ZANE DAVID MEMEGER  
United States Attorney